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Attorneys for Plaintiff Bandag, Incorporated

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

IN RE RUBBER CHEMICALS ANTITRUST LITIGATION)	MDL Docket No. C 04-1648 MJJ
)	Individual Case No. C 06-5700 MJJ
)	
)	
THIS DOCUMENT RELATES TO:)	STIPULATION REGARDING
)	EXPERT DISCOVERY [AND]
<i>Bridgestone Americas Holding, Inc., et al.</i>)	PROPOSED ORDER
<i>v. Chemtura Corporation, et al.</i>)	

1 Plaintiff and Defendants (collectively, the “Parties”) in *Bridgestone Americas Holding,*
2 *Inc., et al. v. Chemtura Corporation, et al.*, Individual Case No. C 06-5700 MJJ (the “Action”),
3 by and through their respective counsel, with regard to respective experts retained by them (both
4 testifying and non-testifying), seek to limit document discovery and HEREBY AGREE AND
5 STIPULATE THAT:

6 1. Subject to the exception below, notwithstanding any provision of the Federal
7 Rules of Civil Procedure or local rules, no Party shall seek from any other Party document
8 discovery (both electronic and written) of: (a) communications or correspondence between any
9 Party’s attorney(s) and expert(s) (both testifying and non-testifying), (b) experts’ notes, or (c)
10 draft(s) of any expert’s report(s). The exception to this agreement is that, in the event that an
11 expert is relying on a fact or document provided to him or her by counsel in expressing his or her
12 opinions or in giving testimony, the fact or document upon which the expert is relying shall be
13 discoverable.

14 2. Nothing herein shall otherwise modify or eliminate any requirements with respect
15 to experts contained in Federal Rule of Civil Procedure 26 or any other applicable local rule.

16 **IT IS SO STIPULATED.**

17 Dated: June __, 2007

CROWELL & MORING LLP

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1 ADDITIONAL SIGNATURE PAGE TO STIPULATION REGARDING EXPERT
2 DISCOVERY AND [PROPOSED] ORDER

3 Dated: June __, 2007

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15 Attorneys for Defendants Chemtura Corporation
16 (formerly known as Crompton Corporation) and
17 Uniroyal Chemical Company, Inc.

18 *Admitted in New York Only

19 Dated: June __, 2007

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27 Attorney for Defendant James J. Conway

28 [SIGNATURES CONTINUED ON FOLLOWING PAGE]

1 ADDITIONAL SIGNATURE PAGE TO STIPULATION REGARDING EXPERT
2 DISCOVERY AND [PROPOSED] ORDER

3 Dated: June __, 2007

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13 Dated: June __, 2007

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21 Attorneys for Defendant Joseph B. Eisenberg

22 Dated: June __, 2007

**MORVILLO, ABRAMOWITZ, GRAND, IASON,
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 Attorneys for Defendant Peter D. Welch


GOOD CAUSE APPEARING THEREFORE, IT IS ORDERED, THAT:

1. Subject to the exception below, notwithstanding any provision of the Federal Rules of Civil Procedure or local rules, no Party shall seek from any other Party document discovery (both electronic and written) of: (a) communications or correspondence between any Party's attorney(s) and expert(s) (both testifying and non-testifying), (b) experts' notes, or (c) draft(s) of any expert's report(s). The exception to this agreement is that, in the event that an expert is relying on a fact or document provided to him or her by counsel in expressing his or her opinions or in giving testimony, the fact or document upon which the expert is relying shall be discoverable.

2. Nothing herein shall otherwise modify or eliminate any requirements with respect to experts contained in Federal Rule of Civil Procedure 26 or any other applicable local rule.

IT IS SO ORDERED.

Dated: 7/13, 2007

BY: 

HONORABLE MARTIN J. JENKINS
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
CALIFORNIA